

EICHHORN & HOO, LLC

Kalani K. Hoo, Esq.

Nevada Bar No. 6687

515 East Bonneville Avenue

Las Vegas, NV 89101

(702) 382-8278 phone

(866) 381-8264 fax

Attorney for Defendant Michael Paul Palumbo

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL PAUL PALUMBO,

Defendant.

Case No.: 2:09-CR-207-RLH-GWF

**EMERGENCY MOTION TO
WITHDRAW AS COUNSEL AS
COUNSEL OF RECORD**

EXPEDITED CONSIDERATION
REQUESTED

CERTIFICATION: This Emergency Motion to Withdraw as Counsel of Record is timely filed.

Comes now, Kalani K. Hoo, Esq., and moves this Court for an Emergency Order allowing the Withdrawal of Kalani K. Hoo, Esq., as attorney of record for Defendant, MICHAEL PAUL PALUMBO, and the appointment of appellate counsel in the above-entitled matter. This Emergency Motion is made and based upon the pleadings and papers on file herein, and the attached Memorandum of Points and Authorities.

DATED this 12th day of July, 2010.

By /s/ Kalani K. Hoo
KALANI K. HOO, ESQ.

MEMORANDUM OF POINTS AND AUTHORITIES

This Court has authority to permit withdrawal of counsel of record

Appointed Counsel Kalani K. Hoo, Esq., respectfully requests permission to withdraw as counsel of record for Defendant PALUMBO.

1. The Defendant was found guilty of Count on April 7, 2010, and guilty of counts 2 and 3 on May 4, 2010.
2. The Defendant was sentenced on July 12, 2010. The time for filing a notice of appeal will lapse on July 26, 2010.
3. Counsel for PALUMBO informed the Defendant that Counsel would move to withdraw so that appellate counsel could be appointed to represent him.
4. Counsel Hoo advises the Court that he will remain available to assist appellate counsel.
5. Counsel Hoo hereby requests that the Court issue an Order granting Counsel's Emergency Motion permitting his withdrawal and for a companion order appointing new counsel for PALUMBO.
6. Counsel Hoo respectfully requests that this Court give this Motion expedited consideration, as PALUMBO has a limited time to Notice his Appeal.
7. PALUMBO'S last known address is the North Las Vegas Detention Center, located at 2332 Las Vegas Blvd. North, Suite 200, North Las Vegas, NV 89030.

Dated this 12th day of July, 2010.

IT IS SO ORDERED.

Respectfully submitted,

By /s/ Kalani K. Hoo
KALANI K. HOO, ESQ.



ROGER L. HUNT
CHIEF UNITED STATES DISTRICT JUDGE